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PLEASE REPLY TO

ATLANTIC COUNTY OFFICE

March 24, 2025

Magistrate Judge Matthew J. Skahill
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: John J. Walsh, Jr. v. Township of Galloway, Township of
Mullica, Police Officer Hardikkumar Patel, Police Officer
Robert Winkel, Police Officer Lupinetti, and Mullica Chief
of Police, Brian J. Zeck
Civil Docket: 1:22-cv-03336-KMW-MJS

Dear Judge Skahill:

We represent the Defendants, Township of Galloway, Township
of Mullica, Police Officer Hardikkumar Patel, Police Officer
Robert Winkel, and Police Officer Lupinetti, in the above-
captioned case. Please accept this letter brief in lieu of a more
formal brief in support of Defendants' Motion to Seal Exhibit 1

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March 21, 2025

Magistrate Judge Matthew J. Skahill

Re: John J. Walsh, Jr. v. Township of Galloway, Township of Mullica, Police Officer Hardikkumar Patel, Police Officer Robert Winkel, Police Officer Lupinetti, and Mullica Chief of Police, Brian J. Zeck
Civil Docket #: 1:22-cv-03336-KMW-MJS

of the Defendants' reply brief in support of their motion for summary judgment (ECF No. 83-1).

On this date the Defendants filed a Reply Brief in support of their Motion for Summary Judgment. Enclosed with that motion is one exhibit. Defendants request that this exhibit be filed under seal because it contains confidential information about the Plaintiff, specifically certain personal identifiers, such as Plaintiff's date of birth which were mistakenly not redacted. Public disclosure of this information could be potentially harmful to Plaintiff. The plaintiff has consented to the filing of Exhibit 1 (ECF No. 83-1) under seal.

Thank you for your consideration.

Very truly yours,

BARKER, GELFAND & JAMES
a Professional Corporation

JPS/tjg

By: s/Todd J. Gelfand
Todd J. Gelfand, Esquire

cc:

RICHARD M. WIENER
Attorney for Plaintiff